

REMARKS

Applicants respectfully request reconsideration of the present application.

Claims 1-27 are pending. Claims 1, 10 and 19 have been amended. No new matter has been added.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

Allowable Subject Matter

Applicants thank the Examiner for allowing the subject matter in claims 4, 7, 13, 16, 22 and 25; the Examiner stated that claims 4, 7, 13, 16, 22 and 25 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Nonetheless, Applicants do not rewrite those claims because Applicants believe that their based claims, as amended, have overcome the rejection under 35 U.S.C. § 103 as discussed below.

Rejection under 35 U.S.C. § 103

The Examiner rejected claims 1-3, 5-6, 8-12, 14-15, 17-21, 23-24 and 26-27 under 35 U.S.C. § 103(a) based on U.S. Patent No. 6,885,395 of Rabbani et al. ("Rabbani") in view of U.S. Patent No. 5,040,233 of Davy et al. ("Davy").

Claim 1, as amended, includes "... adjust file size of the image data based on a memory domain management unit ... such that the file size becomes near, but does not exceed an integer multiple of the memory domain management unit of the memory medium, *wherein size of the memory domain management unit is equal to size of a sector of the memory medium.*" In claim 1, the size of a file which contains image data is adjusted based on the size of a sector of a memory medium such that that the file size becomes near, but does not exceed an integer multiple of the size of the sector.

Neither Rabbani nor Davy, nor a combination of both, teaches or suggests such limitations. The Examiner acknowledged that Rabbani does not teach or suggest the file size becomes near, but does not exceed an integer multiple of a memory domain management unit of the memory medium. (page 3, Office Action dated 6/25/2008)

Davy does not teach or suggest the same limitations that are missing in Rabbani. Davy proposes discarding one or more lines of a block of pixels (raw data) until the compressed data fits within the allotted space in memory. However, a block of pixels disclosed in Davy is not an equivalent to a sector set forth in claim 1. A block of pixels represents a unit of image data *itself*. On the other hand, a sector represents a unit of a *memory medium*. It is well known that a subdivision of a physical track on a magnetic or optical disc is called a "sector."

Accordingly, it is clear that Davy's disclosure, *i.e.*, discarding one or more *lines of a block of pixels*, does not teach or suggest adjusting a file size based on *a size of the sector*

such that *the file size becomes near, but does not exceed the integer multiple of the size of the sector*, as required by claim 1.

Thus, a combination of Rabbani and Davy still lacks of a pertinent feature of claim 1, "... adjust file size of the image data based on a memory domain management unit ... such that the file size becomes near, but does not exceed an integer multiple of the memory domain management unit of the memory medium, *wherein size of the memory domain management unit is equal to size of a sector of the memory medium.*"

Therefore, Applicants respectfully request withdrawal of the rejection of claim 1 under 35 U.S.C. § 103(a) in view of Rabbani and Davy.

Claims 10 and 19 contain similar limitations as the limitations of claim 1. Therefore, at least for the reason stated above, Applicants respectfully request withdrawal of the rejection of claims 10 and 19 under 35 U.S.C. § 103(a) in view of Rabbani and Davy.

Claims 2-3, 5-6, 8-9, 11-12, 14-15, 17-18, 20-21, 23-24 and 26-27 depend, directly or indirectly, from one of claims 1, 10 and 19 and thus, include the limitations set forth in their respective base claim. Therefore, at least for the reason discussed above, Applicants respectfully request withdrawal of the rejection of claims 2-3, 5-6, 8-9, 11-12, 14-15, 17-18, 20-21, 23-24 and 26-27 under 35 U.S.C. § 103(a) in view of Rabbani and Davy.

In view of the foregoing amendments and remarks, Applicants respectfully submit that the pending claims are in condition for allowance.

Please charge any shortages and credit any overages to Deposit Account No. 02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

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